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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
RAMON DESAGE,)
Defendant.)
CASE NO.: 2:13-CR-00039-JAD-VCF

**STIPULATION TO CONTINUE
BRIEFING SCHEDULE ON TAX LOSS
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, between, Defendant Ramon Desage, by and through his counsel, Richard A. Wright, Esquire, and George Kelesis, Esquire, and Plaintiff, United States of America, represented by Nicholas Trutanich, United States Attorney, and Patrick Burns, Assistant United States Attorney, that the schedule for the parties' briefing on tax loss, be reset so that Defendant Desage's response brief is due April 26, 2019, and the government's reply is due on May 10, 2019.

This Stipulation is entered into for the following reasons:

1. On February 12, 2019, the Court set a briefing schedule on tax loss to be used in sentencing Defendant Desage. The government's opening brief regarding tax loss was due and filed

on March 29, 2019; Desage's responsive brief is currently due on April 12, 2019, and the government's reply brief is currently due on April 19, 2019.

2. The two week extension of time for filing the Desage Response is necessitated by unanticipated medical issues by counsel for Mr. Desage which prevent counsel from meeting the current schedule.

3. In order to provide the Court a meaningful brief that helpfully reconciles the disparate views of the parties and their experts, a continuation of the briefing schedule appears necessary.

4. The parties are conscious of the Court's admonition against enlargement of the briefing schedule and the need to bring this litigation to a conclusion. This request for a continuation of the briefing is made for good cause, without an intention to unnecessarily delay the proceedings, and with the intention to provide the Court the most meaningful briefing on the tax loss issue.

Dated this 10th day of April, 2019.

NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

BY /s/ Richard A. Wright
RICHARD A. WRIGHT, ESQUIRE
GEORGE KELESIS, ESQUIRE

BY /s/ Patrick Burns
PATRICK BURNS
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On February 12, 2019, the Court set a briefing schedule on tax loss to be used in sentencing Defendant Desage. The government's opening brief regarding tax loss was due and filed on March 29, 2019; Desage's responsive brief is currently due on April 12, 2019, and the government's reply brief is currently due on April 19, 2019.

2. The two week extension of time for filing the Desage Response is necessitated by unanticipated medical issues by counsel for Mr. Desage which prevent counsel from meeting the current schedule.

3. In order to provide the Court a meaningful brief that helpfully reconciles the disparate views of the parties and their experts, a continuation of the briefing schedule appears necessary.

4. The parties are conscious of the Court's admonition against enlargement of the briefing schedule and the need to bring this litigation to a conclusion. This request for a continuation of the briefing is made for good cause, without an intention to unnecessarily delay the proceedings, and with the intention to provide the Court the most meaningful briefing on the tax loss issue.

For all of the above-stated reasons, the ends of justice would be served best by a continuance of the briefing schedule.

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ORDER

IT IS ORDERED that the deadline for Defendant Desage to file his response brief on the tax loss issue in United States v. Ramon Desage, Case No. 2:13-CR-039-JAD-VCF, is reset to April 26, 2019. And the deadline for the government's reply brief is reset to May 10, 2019. **No further extensions will be granted.**

Dated this 12th day of April, 2019.

JENNIFER A. DORSEY
United States District Judge